

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

TRACY CAEKAERT, and
CAMILLIA MAPLEY,

Case No.
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY, SR.,

VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION
OF JAMES ROWLAND

Defendants.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Cause No.
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., and
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

James Rowland

1 A. No. There was about 40 elders in the
2 group, some new ones, some old ones. And I can't
3 even remember who the instructor was. He might
4 have been from New York.

5 Q. Okay. Someone you hadn't seen before.

6 A. Yeah, he was just here to teach that class
7 and then go back to New York or whatever.

8 Q. And in addition to the Bible, were they
9 using other books as part of your training?

10 A. Yeah. Yeah, with the -- like, the
11 teaching book, you know, like, one of the
12 publications is to become a better teacher, you
13 know, and --

14 Q. Let me show you a document. This is
15 called "Kingdom Ministry School Course."

16 A. Yeah.

17 Q. And it's Bates WTPA 1 is the first page of
18 this document. It's the document that was given to
19 us by WTPA, the Pennsylvania corporation.

20 A. Yeah.

21 Q. And you'll see there -- can you read that
22 okay?

23 A. Yeah.

24 Q. It's dated October 1972?

25 A. Uh-huh. Yeah, that's the thing that --

James Rowland

1 that's the publication that was used.

2 Q. For the training as an elder?

3 A. Yeah.

4 Q. Can I go back to that cover page for a
5 second? So "Watch Tower Bible and Tract Society of
6 Pennsylvania, 1972," does that look like the
7 document that maybe you saw when you were being
8 trained in 1975?

9 A. Yeah. Yeah, it's a book about like this
10 (indicating). It's a red -- it's -- what do they
11 call them now? A real deep red, burgundy almost.

12 Q. And you were using your hands to describe
13 a very big book, thick?

14 A. About like that.

15 Q. Yeah.

16 A. And that was the Kingdom Ministry School.

17 Q. How much time did you spend at that
18 training in Billings? Do you remember?

19 A. I think it was a month. It might have
20 been -- it might have been two weeks. But it was a
21 number of days involved.

22 Q. Okay. So fairly extensive, then.

23 A. Yeah.

24 Q. And did you stay in Billings or did you
25 drive back and forth?

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James Rowland

1 A. I had to stay in Billings.

2 Q. And did they pay for that for you?

3 A. No.

4 Q. You had to pay for it on your own?

5 A. Yeah.

6 Q. Okay. Let's maybe mark -- can we mark
7 this and keep it in the binder as No. 2?

8 (Deposition Exhibit No. 2 was marked for
9 identification.)

10 BY MR. SHAFFER:

11 Q. We'll come back to that document later,
12 all right?

13 A. Okay.

14 Q. Did the other elders from the Hardin
15 Congregation come with you for that training in
16 1975, or --

17 A. No. They had been through that I guess
18 the year before. And being that I was new at the
19 job, so to speak, they invest the time and effort
20 into this so you're a better teacher and a better
21 overseer.

22 Q. When you say that, you mean the people
23 from New York who are doing the training in
24 Billings?

25 A. Yeah.

James Rowland

1 Q. Okay. And do you recall, were there other
2 books besides this Kingdom Ministry School Course
3 book that they used to help train you? Were
4 there --

5 A. Well, they used the Bible, of course, all
6 the time. But I think there was enough in there to
7 keep you busy. And that's why, you know, I refer
8 to that, and I still remember it.

9 Q. Yeah. And so describe to me what your
10 days were like in Billings during that training.

11 A. It was just a training, period, and not
12 much of anything else.

13 Q. Was everybody in the same room?

14 A. Yeah. It was in one of the Kingdom Halls.
15 I can't remember.

16 Q. And is there someone at the front of the
17 room talking to everybody else?

18 A. Yeah, uh-huh. Yeah. Lecture series, you
19 know, lecture style.

20 Q. And everybody's got their own copy of the
21 book?

22 A. Uh-huh.

23 Q. This Kingdom Ministry School Course book?

24 A. Yeah, plus their own notebook.

25 Q. And are you just going through it, working 70

James Rowland

1 your way through it day by day?

2 A. Yeah. And there was, you know, like a lot
3 of questions on it, and --

4 Q. So you just raise your hand if you have a
5 question?

6 A. Yeah. And it was a fairly good teaching
7 event, learning.

8 Q. Okay. Was it helpful to you in helping --

9 A. It was, yeah.

10 Q. And tell me how. Tell me how it helped
11 you.

12 A. Well, you know, you have questions as to,
13 you know, the responsibility you have in talking to
14 people, and what happens if you're rejected or
15 physically assaulted or whatever, you know, how to
16 handle situations like that, and just all kinds of
17 stuff that helped you as a minister, I guess.

18 Q. And so as an example, right, if someone
19 came to you as an elder and said, "Yeah, I was
20 physically assaulted," right, "Somebody punched me
21 in the face. Mr. Rowland, Brother Rowland,
22 so-and-so punched me in the face. What do I do,"
23 would your training in Billings and your reference
24 of this Kingdom Ministry School Course, would that
25 have helped you understand how to help that person? 71

James Rowland

1 A. Uh-huh.

2 Q. That was a "yes"?

3 A. Uh-huh.

4 Q. "Yes"?

5 A. Yes.

6 MR. TAYLOR: Object to the form.

7 BY MR. SHAFFER:

8 Q. And that's how -- that training in
9 Billings and this book here, this Exhibit 2, that
10 informed you on how to work as an elder and how to
11 communicate with the other members of the
12 congregation and help them; is that right?

13 A. Yes.

14 Q. And would you reference back to this book,
15 this Exhibit No. 2, while you were working as an
16 elder? Would you look at it from time to time?

17 A. Yeah, any of the publications, you know,
18 to -- something specific that you don't know
19 exactly how to handle, you go in here and under
20 that title or that subject area, and it was very
21 helpful.

22 Q. Okay. So just going back to kind of your
23 evolution -- I'm going to call it your evolution as
24 a member of the church, in 1969, you're baptized,
25 you're a book study conductor.